

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, by her parents and next friends Sara Tirrell  
and Zachary Tirrell, *and*

Iris Turmelle, by her parents and next friends Amy  
Manzelli and Chad Turmelle,

Plaintiffs.

v.

Civil Action No. 1:24-cv-251

Frank Edelblut, *in his official capacity as Commissioner of  
the New Hampshire Department of Education;*

Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro,  
Rajesh Nair, James Fricchione, and James Laboe, *in their  
official capacities as members of the New Hampshire State  
Board of Education;*

Pemi-Baker Regional School District;

Lisa Ash, Bernice Sullivan, Sheila Donahue, Tony Torino,  
Carolyn Varin, Peter Jackson, Phil McCormack, Greg  
Aprilliano, Bonnie Acton, Barbara Noyes, Paul Ciotti,  
Sam Brickley, and Paul Pizzano, *in their official  
capacities as members of the Pemi-Baker Regional School  
Board;*

Pembroke School District; and

Andrew Camidge, Gene Gauss, Kerri Dean, and Melanie  
Camelo, *in their official capacities as members of the  
Pembroke School Board,*

Defendants.

**MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF BENNETT KLEIN AS  
ADDITIONAL COUNSEL FOR PLAINTIFFS PARKER TIRRELL AND IRIS  
TURMELLE**

Pursuant to Local Civil Rule 83.2(b), I hereby move for the admission, *pro hac vice*, of Bennett Klein, an attorney with the law firm of GLBTQ Legal Advocates & Defenders and a member of the bar of the Commonwealth of Massachusetts, as additional counsel for Plaintiff Parker Tirrell, by her parents and next friends Sara Tirrell and Zachary Tirrell, and Plaintiff Iris Turmelle, by her parents and next friends Amy Manzelli and Chad Turmelle. Attorney Klein's affidavit is filed herewith.

WHEREFORE, I respectfully request that this Honorable Court:

- A. Grant this Motion for Admission Pro Hac Vice of Bennett Klein as additional counsel for Plaintiff Parker Tirrell, by her parents and next friends Sara Tirrell and Zachary Tirrell, and Plaintiff Iris Turmelle, by her parents and next friends Amy Manzelli and Chad Turmelle; and
- B. Grant such other and further relief as may be just and equitable.

Date: August 16, 2024

Respectfully submitted,

/s/ Chris Erchull

Chris Erchull (N.H. Bar. No. 266733)  
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**SUPPORTING AFFIDAVIT OF BENNETT KLEIN**

I, Bennett Klein, pursuant to Local Rule 83.2(b)(1), hereby certify that:

1. My office is located at 18 Tremont Street Suite 950, Boston, Massachusetts 02108, and my phone number is (617) 426-1350. My email address is [bklein@glad.org](mailto:bklein@glad.org).
2. I am eligible to practice in and a member in good standing of the Bar of the Commonwealth of Massachusetts (1987). I am also presently admitted to and eligible to practice in the following courts: U.S. District Court for the District of Massachusetts (1988); United States Court of Appeals for the First Circuit (1993); United States Court of Appeals for the Fifth Circuit (2023); United States Tax Court (2006); United States Supreme Court (1995).
3. I am not currently suspended in, nor have I been disbarred from any jurisdiction.
4. I have never been denied admission to any court. I have not been the subject of any past or pending disciplinary matters and have no prior felony or misdemeanor criminal convictions.
5. My *pro hac vice* status has never been denied or revoked in any court.
6. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 16th DAY OF AUGUST 2024.

/s/ Bennett Klein

Bennett Klein (MA Bar No. 550702)  
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